

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CATHERINE GAUJACQ,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 1:05CV0969
v.	:	
	:	
ELECTRICITE DE FRANCE	:	
INTERNATIONAL NORTH AMERICA, INC.,	:	
	:	
ELECTRICITE DE FRANCE, S.A.,	:	
	:	
and	:	
	:	
CHRISTIAN NADAL,	:	
	:	
Defendants.	:	

**CONSENT MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and LCvR 16.1 of the Local Rules of the United States District Court for the District of Columbia, the undersigned counsel for defendants Electricite De France, S.A., Electricite De France International North America, Inc., and Christian Nadal (collectively "Defendants") hereby request entry of an order: (1) extending the time in which Defendants may answer or otherwise respond to Plaintiff's Complaint through and including September 12, 2005; (2) setting November 14, 2005 as the deadline for Plaintiff's opposition to any motion filed under Rule 12(b) of the Federal Rules of Civil Procedure; and (3) requiring Defendants to file any reply briefs in support of such motion or motions within 30 days of the filing of Plaintiff's opposition.

The undersigned counsel, including counsel for Plaintiff, consent to the requested extension of time and briefing schedule. Service upon the French defendant, Electricite De France, S.A., was accomplished on August 18, 2005, and its response would otherwise be due on September 7, 2005. Defendants have requested, and Plaintiff has agreed, that they be afforded until September 12, 2005 to answer or otherwise respond. Although the responsive pleading deadline has previously been extended for Electricite De France International North America, Inc. and Christian Nadal, this would be the first extension to be granted for defendant Electricite De France, S.A., and the parties agree that proceeding in tandem will facilitate the more efficient expenditure of the resources of the parties and the Court.

Dated: August 25, 2005

/s/

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